

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Lois Harris <u>Debtor(s)</u>	CHAPTER 13
PENNSYLVANIA HOUSING FINANCE AGENCY <u>Movant</u> vs.	NO. 17-16232 MDC
Lois Harris <u>Debtor(s)</u>	11 U.S.C. Section 362
William C. Miller Esq. <u>Trustee</u>	

**STIPULATION ALLOWING FOR SECURED CREDITOR,
PENNSYLVANIA HOUSING FINANCE AGENCY, TO FILE A LATE PROOF OF CLAIM**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. Debtor filed the instant Chapter 13 Bankruptcy on September 12, 2017.
2. The deadline for filing claims was set as January 23, 2018, and the deadline for government claims was March 11, 2018.
3. On October 9, 2018, Pennsylvania Housing Finance Agency (“Movant”) filed a Motion to Allow Filing of a Proof of Claim.
4. The Parties have now reviewed the claim in depth to come to a resolution of this matter.
5. This matter is to be resolved as per the following terms:
 - a. Within fourteen (14) days of the filing of this Stipulation, Secured Creditor is to file its Proof of Claim setting forth total arrears in the amount of \$1,100.32 and a total secured claim in the amount of \$29,287.98.

Date: 10/10/18

By: Rebecca A. Solarz, Esquire
Rebecca A. Solarz, Esquire
Attorney for Secured Creditor

Date: 10/12/18

By: Timothy Zearfoss, Esquire
Timothy Zearfoss, Esquire
Attorney for Debtor

Date: 10/23/18

By: William Miller
William Miller
Chapter 13 Trustee

Jacqueline Charles
no position
***without prejudice to any
trustee rights or remedies**

Approved by the Court this _____ day of _____, 2018. However, the court retains discretion regarding entry of any further order.

Bankruptcy Judge
Magdeline D. Coleman